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ABSTRACT

This paper describes some major issues facing federal and local administrators in their efforts to build local capacity in bilingual education through the Title VII grants program. The discussion is developed in three parts: (1) the legislative history of the capacity building mandate in Title VII and the federal statutory provisions shaping this mandate's implementation: (2) findings of earlier studies by the Rand Corporation and the NTS Research Corporation on efforts to institutionalize educational improvements through federal programs: and (3) the issue of capacity building within the specific context of the Title VII program. On the issue of capacity building, the study considers key issues which should be addressed by a department in designing and implementing procedures for application approval, technical assistance, monitoring, and evaluation. It discusses concerns related to building effective local bilingual programs and the programs. Finally, some suggestions from research on institutionalizing educational change are given to provide guidance on fostering legitimacy in local bilingual programming. (AMH)

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BUILDING LOCAL CAPACITY FOR BILINGUAL EDUCATION THROUGH ESEA TITLE VII: INTRODUCING THE ISSUES

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The Education Amendments of 1978 (Public Law 95-561) established new priorities in the federal government's program of assistance for bilingual education. Under the 1978 provisions local school districts receiving federal grants under Title VII of the Elementary and Secondary Education Act (ESEA) are required to use grant funds to improve their capabilities for providing high quality bilingual education. Support for a "capacity building" federal grants program is premised on the assumption that federal funds, under certain pre-determined circumstances, can be effective in stimulating the local development of educational activities which meet criteria of (1) permanence, (2) high educational quality, and (3) service to all students requiring such instruction. In the case of Title VII the "capacity building" approach is applied specifically to bilingual education services for students who are limited in English proficiency.

This emphasis on capacity building in Title VII contrasts with other approaches which could have been chosen by Congress for the delivery of federally-supported bilingual aid. Possible alternative approaches included direct support for bilingual instruction (with no local obligation for contribution of state or local funds) and federal sponsorship of model bilingual programs. The first approach is somewhat analogous to the federal assistance provided under Title I of ESEA and the second approach is analogous to the Follow Through program.

This paper describes some of the major issues facing federal and local administrators in their efforts to build local capacity in bilingual education through the Title VII grants program. The paper is divided into three major sections. The first section describes the legislative history of the capacity building mandate in Title VII and the federal statutory provisions shaping this mandate's implementation. The second section presents findings of earlier studies on efforts to institutionalize educational improvements through federal

categorical programs. In the third section the issue of capacity building is addressed within the specific context of the Title VII program.

Legislative and Regulatory Background

When the Bilingual Education Act was enacted in 1968 (as part of Public Law 90-247), Congress expected that the program would "... provide financial assistance to local educational agencies (LEAs) to develop and carry out new and imaginative elementary and secondary school programs ..." for students of limited English speaking ability. As with other demonstration programs, the ostensible purpose of federal funding for bilingual projects was to provide "seed money" which would help grantees design and initiate certain types of instructional programs. Through examinations of the resulting projects, it was believed that the effectiveness of the bilingual approach being used in each project could be determined. It was also expected that the federal support being provided to projects would lead to their eventual local expansion and institutionalization.

In considering reauthorization of Title VII in 1978, Congress was concerned that the program was not actually demonstrating effective approaches in bilingual education but had rather "... taken on the characteristics of an educational service program," as reported in 1976 by the U.S. General Accounting Office (page 17).[1/] Projects appeared to be using federal funds as a source of permanent support for bilingual educational services, with few local or federal steps taken toward eventual expansion or institutionalization of services through increases in local and state financial support.

Congress responded to these findings by restating in 1978 the intention that Title VII aid should be used as seed money to initiate promising bilingual

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[1/] Full citations are noted in the list of references at the end of the paper.

education projects. The House report, for example, directed that Title VII funds "... should be used to get effective programs started," and "once underway, local districts should be encouraged to pick up the costs if that is at all possible..." (Committee on Education and Labor 1978, page 88). Similarly the Senate report indicated that "... it is important to utilize scarce funds for demonstration programs and projects, with a view toward stimulating interest and initiative among state and local educational agencies throughout the nation which ultimately would lead to successful non-federal programs" (Committee on Human Resources 1978, page 70).

The most important new legislative provision for implementing this capacity building mandate can be found in Section 721(b)(3)(E) of the 1978 legislation. This provision states that applications under Title VII can be approved only if:

> "The Secretary determines the assistance provided under the application will contribute toward building the capacity of the applicant to provide a program of bilingual education on a regular basis which will be of sufficient size, scope, and quality to promise significant improvement in the education of children of limited English proficiency, and that the applicant will have the resources and commitment to continue the program when assistance under this title is reduced or no longer available."

New regulations for Title VII operationalize the statutory goal of building local service capacity. The statements describing the two major Title VII subprograms for elementary and secondary schools highlight the goal of capacity building:

- Basic Projects in Bilingual Education. . . are designed to build the capacity of the grantee to continue programs of bilingual education when federal funding is reduced or no longer available (§123.1(a)).

- Demonstration Projects. . . provide financial assistance to demonstrate exemplary approaches to. . . building the capacity of the grantee to continue those programs when federal funding is reduced or no longer available (§123.1(b)).

Descriptions of other Title VII sub-programs reinforce the statutory priority on assisting LEAs to design high quality programs which meet capacity building objectives. For example, §123c.10(b) of the regulations authorizes state educational agency projects to carry out activities "coordinating assistance to local educational agencies in developing budget and funding strategies for continuing programs of bilingual education when federal funds are reduced or no longer available."

Criteria for selection of bilingual grantees reflect the importance of the capacity building mandate. A new criterion for basic project grants (worth 20 out of 100 points) focuses explicitly on the applicant's efforts to increase local capacity. Section 123a.30(g) states that in selecting local projects for Title VII support:

> ... the Secretary considers -
>
> (1) Evidence of the applicant's past commitment to bilingual education; and
>
> (2) The likelihood that the applicant will continue or increase that commitment as indicated by ---
>
> (i) Its plan for continuing teacher training when federal funds are reduced or no longer available;
>
> (ii) Its plan for expansion of the project;
>
> (iii) Its plan to provide follow-up services from state and local resources to children who have achieved proficiency in English;
>
> (iv) Specific plans for its gradual assumption of the costs of the program during the project period; and
>
> (v) Plans for providing non-federal resources to meet bilingual education needs in future years.

Relevant Research on Institutionalizing Federally Supported Education Projects

Title VII is not the only federal education program designed to employ federal funds to stimulate the development and eventual institutionalization of effective local programs. Federal sponsorship of such "seed money" projects in education has been fairly common throughout the 1970s. Major federally funded evaluations of some of these programs have produced findings that should prove instructive to efforts at institutionalizing Title VII projects. Of particular interest are the findings from the study of four federal educational programs supporting change and the evaluation of the Fund for the Improvement of Post-secondary Education.

The Change Agent Studies

From 1973-1977 the Rand Corporation conducted for the U.S. Office of Education (OE) a study of four federal programs supporting change in schools. Title VII was one of the programs studied; the other three were Title III of ESEA, Part D of the Vocational Education Act, and the Right to Read program. In the second phase of that study Rand investigated 194 completed Title III projects. One of the major goals of this research was to determine the key factors associated with eventual project continuation and institutionalization.[2/]

The vast majority of Title III projects studied by Rand failed to become institutionalized. Some 30 to 40 percent of these 194 Title III projects examined in the change-agent studies had been completely discontinued two years after federal project support terminated. Of 100 continued projects selected

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[2/] Rand defined institutionalization as the highest form of project continuation, in which project-related changes persist over time because they are integrated into the school system as a standard or characteristic feature of that system's operations (Berman and McLaughlin, Volume III, pp.16 and 182).

by Rand for more intensive study only between 5 and 15 percent were fully institutionalized. The balance were either given limited district support just to keep them alive or were not sustained at the classroom level despite formal district backing.

Rand specified a number of factors which they felt affected the ultimate continuation status of Title III projects. One key finding of the study was that districts which engaged in early planning for project continuation and systematically implemented that continuation plan during the project implementation period were those which successfully institutionalized their projects. These districts would begin to plan a project continuation strategy when developing the grant proposal. To secure long-term project continuation these successful districts actively cultivated community and school support for the project. According to Rand they also replaced existing practices with special project practices that had proven themselves successful; they trained a cadre of personnel who could provide long-term leadership and support for project activities; and they treated the project as a regular part of school operations rather than as a "special project."

In addition to the prerequisite of early planning for, and conscious attention to, project continuation, Rand found that the scope of the change attempted in a project, the specific implementation strategies undertaken, and the leadership activities of the project director and school principals were also related to a project's ultimate continuation status. Projects where the scope of the change attempted at the school level was ambitious and demanding were more likely to be continued in the classroom than projects requiring only marginal changes in teacher behavior. According to the Rand researchers, teachers tended to treat ambitious projects seriously and also continued to support projects where they had already invested major commitments of time and energy.

Specific implementation strategies which imparted in teachers a sense of "ownership" through involvement in project decision-making were also more likely to be continued in the classroom, as were projects with a well-executed staff-support strategy. Materials development was one specific area where teacher participation was found to foster a sense of project ownership. Similarly, implementation strategies incorporating a well-executed staff support program gave teachers the necessary skills and commitment to implement long-term changes in their classroom practices. Both staff support activities and teacher participation in project decision-making promoted what Rand termed "mutual adaptation," i.e., teachers adapting the project to the reality of their own classroom and in turn being changed by it (Berman and McLaughlin, Volume VII, p.187).

Another factor identified by Rand as critical in shaping the ultimate continuation status of Title III projects was the leadership activities of the project director and school principal. Projects were more likely to be continued if the project director communicated project goals and methods clearly and sponsored timely and practical staff-support activities during the period of project implementation. The role of the school principal was found to be especially important in lending moral and organizational support to the efforts of central project staff and in creating an organizational climate of receptivity and enthusiasm for the project venture.

The Evaluation of the Fund for the Improvement of Postsecondary Education

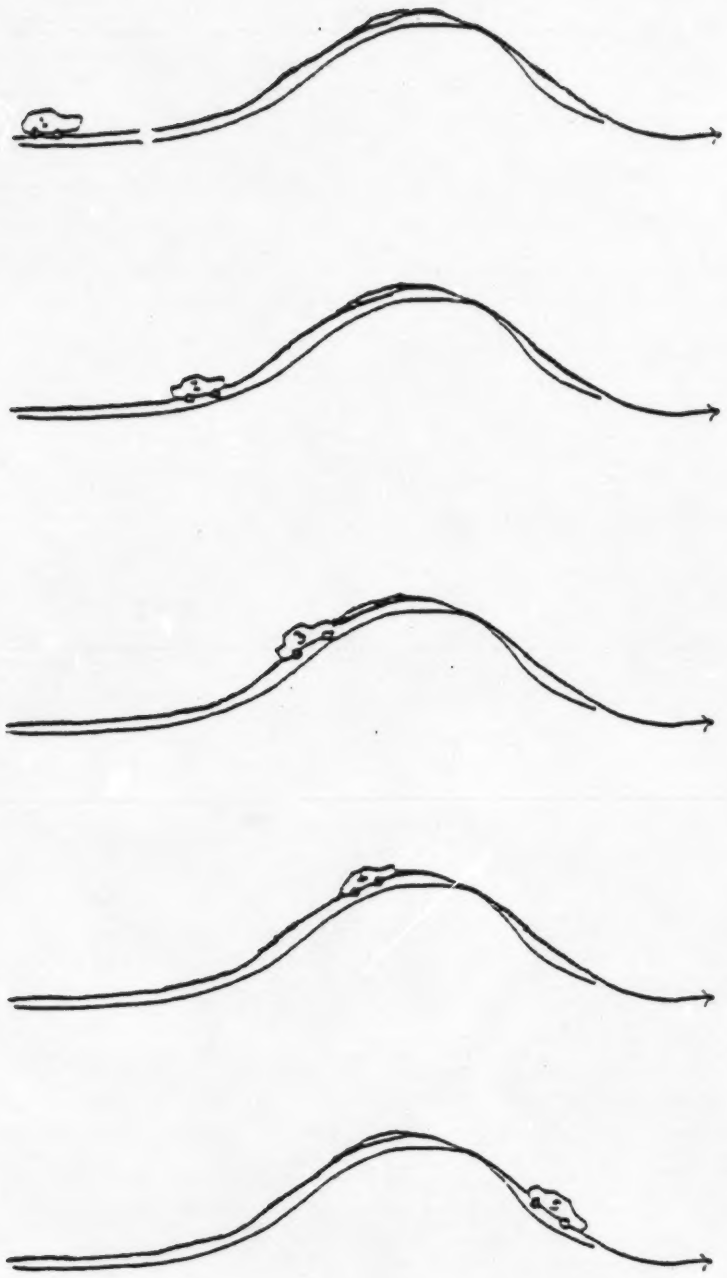
The Fund for the Improvement of Postsecondary Education is a small federal agency which awards seed money grants to institutions proposing to improve the quality of postsecondary education. From its beginning in 1973 through 1979 the Fund supported some 500 projects. Since October 1978, NTS Research Corporation has been conducting a comprehensive evaluation of the Fund for the Office of the ED Assistant Secretary for Planning and Budget (Pelavin et al. 1980). As in the

Rand change-agent studies, major components of this evaluation were to assess the degree to which the Fund's projects continued after federal support terminated and to identify the factors associated with local continuation. The primary data base used by NTS for addressing the issue of project continuation was a comprehensive telephone survey of all Fund grantees from FY 1973 through FY 1978.

Unlike Rand's findings on the institutionalization of Title III projects, NTS found that projects supported by the Fund had high rates of institutionalization.[3/] Of the 271 projects designed to continue after federal support ended, 70 percent became institutionalized according to NTS. Many of the factors identified in explaining the Fund's high institutionalization rate confirm some of Rand's major change-agent findings and provide valuable illustrations as to how to manage a successful educational seed money program.

One key to the success of the Fund is that its proposal approval criteria recognize the critical role of grantee commitment and capacity to use project resources for addressing pressing local educational needs. Agency administrators likened each prospective project to cars climbing a hill in order to reach a major educational improvement objective. The crest of the hill is seen as the point beyond which a project's own internal momentum can enable it to achieve its goals. This "hill climbing" analogy is illustrated on the following page for five potential projects. A "push" along the hill through federal assistance could conceivably be given to any of the five local projects illustrated. However, the Fund would view the need for, and likely impact of, such a push as being substantially different for the five projects represented by cars 1 through 5.

[3/] A completed Fund project was considered to be institutionalized if it continued to exist after the Fund's support ended, such that its activities or services were not substantially reduced and the project director was optimistic about its prospects for long-term survival (five or more years).



Car 1 is currently at the bottom of the hill, indicating that the applicant has not demonstrated a prior local commitment or capacity for addressing the local educational need for which outside support is being sought. Federal support would likely be wasted in this case because of these absences. This is true to

a lesser extent for car 2 as well, which has barely begun its journey in pursuit of its program improvement objectives. Car 5 on the other hand has already climbed the hill. This car has gathered enough momentum on its own that an outside federal "push" is not necessary to meet the desired objectives.

Only cars 3 and 4 would be considered by the Fund to be good candidates for federal assistance. The capacity and commitment of these applicants to improve their program is manifested by the fact that they have, on their own, made substantial progress in their uphill climbs. Modest outside support from the Fund would be designed to facilitate further progress over the hill's crest, from which point the local educational need can be met without further outside assistance.

One specific way in which the Fund attempts to measure grantee capacity and commitment is by review of their plans for securing long-term project continuation. This procedure has the added advantage of inducing most successful applicants to address the question of project continuation when writing their grant proposal.

Capacity Building in Bilingual Education

Project capacity building for ESEA Title VII can be defined as developing the ability among LEA grantees to provide bilingual education services which are effective in meeting the educational needs of target students and which will eventually be incorporated into the regular, on-going programs of funded LEAs. Based on the experiences of other seed money projects in education as well as the prior history of ESEA Title VII, it is clear that it requires more than federal administrative fiat for local projects to achieve these objectives. As a first step ED must design operating procedures for determining which Title VII applicants are most likely to develop effective local bilingual programs that will eventually be institutionalized within their respective programs. That is, to

apply the "hill analogy," they need to know which Title VII applicants have already begun to climb the hill toward achieving effective and institutionalized bilingual programs but would benefit from some assistance in getting over the hill's crest. ED also needs to identify impediments to building local capacity for supported projects and then develop technical assistance strategies to aid in overcoming these impediments. Finally, the agency needs to have a system in place for continuously monitoring and evaluating the impacts of their capacity building initiative.

Building Capacity for Operating Effective Local Bilingual Programs

This section outlines some of the key substantive issues to be addressed by ED in designing and implementing procedures for application approval, technical assistance, monitoring, and evaluation. It is based on reviews of pertinent prior research findings (including those previously highlighted) as well as discussions with bilingual program administrators at the federal, state and local levels. The first part of this section addresses concerns related to building effective local bilingual programs, while the second part focuses on the related but separate question of institutionalizing these programs.

To operate effective local programs, Title VII grantees must possess strong capabilities in the following areas:

- identification and placement of students with limited English proficiency;
- project design and curriculum development;
- staff recruitment, selection, placement, and training;
- evaluation techniques and utilization of data for project improvement;
- project management; and
- parent involvement.

The inadequacy of local technical capabilities for implementing effective Title VII projects has been a common criticism of bilingual projects. (See, for example, the 1976 GAO report and the 1978 Senate and House committee reports on Title VII reauthorization.) Inadequately trained bilingual project staff, poorly developed curricular materials, and haphazard techniques for assessing and placing students in bilingual classrooms have been among the more commonly cited programmatic weaknesses. In a 1979 study of local perceptions of bilingual resource needs, senior personnel in a number of projects expressed a need for additional bilingual curricular materials, additional contact with other bilingual education projects to learn about other program strategies and techniques, and, most of all, additional training and information on teaching methods (Development Associates, pages 105-109).

If the federal government is to use Title VII as a resource to build local district capacity to run effective bilingual projects, it must develop methods of assessing the current technical capabilities of applicants and grantees for operating high quality bilingual projects as well as methods for directly assisting funded projects in increasing such capabilities. These tasks may be made even more complex by the recent announcement of proposed new federal standards for local compliance with Title VI of the Civil Rights Act, as it pertains to national origin minority students who are limited in English proficiency. Many districts already implementing bilingual programs must now upgrade their technical capabilities in areas such as student identification and faculty development, in order to comply with the new civil rights standards. In addition, the promulgation of more explicit civil rights requirements will likely prompt many districts that have not sought Title VII funds previously to apply for such awards in order to help them meet the new requirements. From the point of view of Title VII

administrators at the federal level, an added pressure will be the need to consider the civil rights standards -- as well as other educational criteria -- in assessing and helping to improve the technical capabilities of grantees.

Some of the specific questions to be addressed by ED in assessing a project's capacity and commitment to run an effective bilingual program include the following:

- Identification and placement of students
  - How does the district determine which students are most in need of bilingual services?
  - Do the assessment practices used by the district for identifying and placing students in bilingual programs accurately measure a student's need for bilingual services?
  - Does the district define the need for bilingual services solely in linguistic terms, or are other factors such as cultural, psychological, and achievement-related needs considered?
- Project design and curriculum development
  - Has the district undertaken careful and comprehensive planning efforts related to the implementation of the bilingual project?
  - Does the district specify objectives for its bilingual project and then design a program to meet these objectives?
  - Can the project design be adapted to meet changing conditions and circumstances and unanticipated needs during the period of project operation?
  - Are procedures in place for the coordination of the bilingual project with other Title VII resources (e.g., Title VII providers of technical assistance and training) and with other categorical program activities funded from federal, state, or local sources?
  - Are procedures in place for adequate coordination between a student's bilingual instruction and regular program services?

- Are the instructional model(s) and substantive focus chosen for the bilingual project appropriate to local conditions and circumstances and the student population to be served?

- Does the bilingual project concentrate resources so that the students served can be significantly aided by the project?

- Are the curricular materials used by the district in its bilingual program technically adequate to meet the needs of students in the program?

- Does the district engage in a systematic process of assessing bilingual curricular needs and then developing or obtaining the products which will address those needs?

- Staff recruitment, selection, placement, and training

  - Are systematic local efforts made to recruit qualified bilingual staff from outside the district, as needed?

  - Does the district work with higher education institutions on recruitment and training of the district's bilingual education staff?

  - Are skills in bilingual instructional methods fully considered in recruitment and training efforts?

  - Does the district employ a systematic process for identifying staff development needs and designing appropriate inservice programs?

  - Are staff development activities for bilingual education appropriate given the nature of local conditions and circumstances and the current needs of teachers and administrators?

- Evaluation techniques and utilization of data for project improvement

  - Does the district employ a standard procedure for regularly evaluating the effectiveness of its bilingual program offerings?

  - Are the instruments and procedures used by a district for evaluating bilingual project impact technically sound?

  - Do district evaluation efforts measure gains in addition to cognitive reading gains in English?

- Is the progress of participating students assessed over periods of twelve months or longer?

- Is the evaluation data collected, reported, and used by project managers and teachers as a tool for bilingual project improvements?

- Project management

  - Are sufficient local administrative resources in place to manage the bilingual project effectively?

  - Is the bilingual program adequately coordinated with other related district activities, e.g., compensatory education, pupil support services, and general staff development?

  - Do local bilingual project managers attempt to use the expertise of other district personnel, such as curriculum developers and program evaluators, as well as outside experts in designing and managing their project?

  - Do bilingual project managers provide appropriate dissemination and technical assistance services to promote effective school-level project implementation?

- Parent involvement

  - Does the district's bilingual project directly encourage a parental role in improving student achievement?

  - Are parents of children with limited English proficiency aware of the district's bilingual project and the availability of bilingual services for their children?

  - Are parents of children in the district's bilingual program regularly informed about their children's educational progress?

  - Do parents of children with limited English proficiency participate in the design of the local bilingual project?

In developing local bilingual capacities for running an effective program, two general matters are especially worthy of note. First, obtaining the necessary faculty commitments to the Title VII goals and strategies can be a major implementation hurdle, especially in the rather frequent situations where teachers perceive the bilingual project as a threat to their careers and to established

educational delivery procedures (Sumner and Zellman, page 26). Since teachers are the key actors in implementing local Title VII projects, any antipathy or even indifference on their part toward the program they are implementing diminishes the ability of that program to meet its desired objectives. Thus, the commitment of implementing teachers to the goals and strategies employed in the local Title VII project appears to be a necessary condition for achieving project effectiveness. Local Title VII projects must directly act to develop these faculty commitments when they do not already exist.

A second and related issue in the development of local capacities to run effective programs is making the best use of external resources. This issue is of major importance in Title VII, given the perception of widespread need for upgrading in local project operations and the existence of an extensive technical assistance network in bilingual education. In assessing the utilization of Title VII materials development centers, OE found a reluctance on the part of school districts to make use of these outside resources (Development Associates, page 108). Similarly, the Rand study of local Title VII implementation found grantees tending to underestimate the potential usefulness of bilingual models or materials developed outside their districts and, as a result, using a portion of their limited project resources to "reinvent the wheel" (Sumner and Zellman, pages 25-26). Additionally, the linguistic and conceptual quality of such locally developed materials has been seriously questioned. (See, for example, Committee on Education and Labor, page 9, and GAO, pages 18-23).

On the other side of this question, however, is the belief that the local development of materials for bilingual projects may help to generate necessary staff commitments to bilingual education. While efforts to build technical knowledge and skills may be inhibited by the reluctance of teachers and administrators to use externally developed materials, building a commitment to bilingual goals

may, in fact, be enhanced by local development of curricular approaches and materials. As pointed out earlier, one of the overall conclusions of the Rand change agent study was that teacher participation in local materials development was generally associated with fostering a needed sense of project ownership.

Some tension thus clearly exists between the goals of (1) fostering a sense of ownership in the bilingual project through staff participation in creating the instructional design and (2) taking appropriate advantage of external resources to improve the quality and effectiveness of local project offerings. Successful local Title VII projects need to be aware of this tension and to evaluate their own needs in light of these desirable but sometimes conflicting objectives.

Building Capacity to Ensure Project Continuation and Expansion When Federal Funding Terminates

Supporting a local bilingual project so it can more effectively serve the needs of its target population is an objective that is operationally independent from supporting a project so that it has a better chance of becoming a permanent and ongoing feature of local district operations. To be sure, the two goals may often be related. For instance, an effective bilingual teacher training program may increase the chances for project institutionalization, since the newly trained teachers represent a permanent local resource which at little added local cost can be applied to additional children needing bilingual services. Similarly, a district may be more inclined to continue a bilingual education program that has demonstrated its educational effectiveness than one that has not. However, as the Rand findings make clear, successful projects are not necessarily institutionalized, nor do institutionalized projects necessarily have histories of project success. The study cited many instances of projects which were considered to be educational successes (and thus "effective," according to some set of criteria) but which were not continued after federal support

had ended. Conversely, they found cases in which projects were continued and even expanded at the conclusion of federal funding, despite a lack of evidence that the original projects had met their educational objectives (Berman and McLaughlin, Vol. VII, pages 155-156).[4/]

The issue of local Title VII project institutionalization thus raises concerns that are different from those raised by the issue of project effectiveness, concerns which address the issue of a project's institutional status within its larger environment. For purposes of this discussion, institutionalization has not been defined simply as the physical survival of a bilingual project in a district after Title VII funds are exhausted. In most instances local Title VII projects can be expected to have little trouble continuing in some form after federal funding terminates. The support for bilingual education among its target constituency generally provides a strong incentive for the district to maintain at least some components of the bilingual project. In addition, under the new and more explicit Title VII application requirements, applicants must describe how state and local funds will be used to support bilingual education at the conclusion of Title VII support. And perhaps most significantly, the new civil rights standards give districts no choice but to continue and expand Title VII programs with their own resources.

For purposes of this discussion, institutionalization of Title VII projects is defined as establishment of the long-term <u>legitimacy</u> of local bilingual projects, along with their technical survival. While a project may continue to exist in name and services may continue to be provided after federal funding has terminated, bilingual education may still not be viewed as an ongoing and integral

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[4/] It is useful to note that, among the four change agent programs studied, Title VII projects appeared to demonstrate a particularly low relationship between measures of program effectiveness and local decisions to continue and expand projects initially supported by federal funds. Researchers attributed this low relationship to the highly politicized status of the bilingual projects in the local communities studied (Sumner and Zellman, page 8).

part of a district's regular operations. Instead of being integrated into its larger environment, bilingual education programming may simply be tolerated by local administrators and faculty. If so, its ultimate effectiveness will be severely limited. This kind of non-institutionalized project continuation without real commitment is a distinct possibility in bilingual education projects. While doing what the law or their political constituencies require, many administrators and teachers may be indifferent or even antagonistic towards the philosophical and educational justifications for the existence of these activities.

Research on institutionalizing educational change provides some guidance as to how legitimacy in local bilingual programming can be fostered. Some of these techniques were noted earlier in this paper, such as the local development of project materials, the training of bilingual teachers who will serve as a permanent resource base, and, perhaps the most important factor of all, early planning for incorporation of the project into ongoing district activities. Other techniques include (1) encouraging frequent and regular communications between project and non-project staff, (2) obtaining formal support by the local school board for the project, and (3) gathering project backing from influential persons not directly involved in project implementation, such as school principals, teacher association leaders, community leaders, and citizen advisory groups.

Some of the major questions that need to be addressed by ED in assessing a project's capacity and commitment to become institutionalized include the following:

- Does the project have a well developed plan for eventual institutionalization?
- Does the institutionalization plan include provisions for adequate and permanent
  - funding arrangements;
  - faculty;

- district management arrangements; and

- methods for bilingual program improvements, such as regular faculty development workshops, resources for the purchase of needed equipment and materials, hiring of bilingual program specialists, and the like?

- What specific strategies is the project pursuing (or planning to pursue) with regard to:

  - obtaining and using the support of key district officials and interest groups;

  - locating the bilingual unit in an appropriate position in the district's organizational structure;

  - fostering relationships with other projects serving similar populations, such as Title I ESEA; and

  - designing components of the Title VII project (e.g., faculty development activities, project evaluation activities, and instructional strategies) which will increase the project's potential to be institutionalized?

- Is the project continuously monitoring its progress in meeting its institutionalization objectives and making appropriate revisions in strategy as warranted?

Local Title VII project directors who must design a specific project institutionalization strategy sometimes require very practical assistance in this area. Such assistance is made more difficult by the fact that, beyond some basic principles, there are no hard and fast rules for ensuring project institutionalization. Different strategies are appropriate for different contexts. In some projects, efforts to secure the support of a vocal and visible community constituency for bilingual education may do more harm than good for the long-range institutionalization of a bilingual project. Such support in these cases may only serve to antagonize important district officials or school board members. The project may then continue after federal support terminates but with only a pro forma commitment to bilingual education. The desired prize is won, but the victory is hollow. On the other hand, there may be circumstances where obtaining strong and vocal backing from a community constituency is essential to securing

local commitment to bilingual education. Project directors desiring to see their project as an integral part of the local educational program must therefore decide how to involve the community constituency, given the conditions present in the district.

Among some of the other major decisions local project officials must make in developing a long-term project institutionalization strategy are the following:

- Whether to push for incorporation of the project into a pre-existing structure or to gain increased visibility (but also increased isolation) in a separate administrative unit;
- Whether the program should align itself closely with a strong and ongoing district activity, such as Title I ESEA, which might alienate the project from constituencies taking a different view of the proper context for bilingual education;
- What types of communication between project and non-project faculty and administrators are best for fostering understanding and acceptance of project goals and strategies without also leading to misapprehensions; and
- What kind of instructional design is most likely to generate support for the long-range continuation and expansion of bilingual education in the school district.

The relevant federal issue is how best to provide assistance to districts in making and then implementing these kinds of decisions.

Summary

In this paper we have outlined some of the major issues facing the Education Department in meeting its Title VII capacity building mandate. Title VII capacity building has been defined as developing the ability among school districts to provide services which are (1) effective in meeting educational needs of children with limited proficiency in English and (2) permanent for the population in need. In general, it seems clear that federal efforts in bilingual capacity building must equally address issues of building district and school level commitments for the legitimacy of bilingual projects with those of developing strong local technical capabilities in bilingual education.

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